Seattle R-4

MEMORANDUM

CH2M HILL

PREPARED FOR: Sylvia Burges/EPA Region 10

DATE: November 10, 1995

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MEMORANDUM CH2M HILL

TO: Sylvia Burges/EPA Region 10

COPIES: Byung Maeng/Ecology
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PREPARED BY: Liz Luecker/CH2M HILL

DATE: November 10, 1995

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: October 1 through October 31, 1995

PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

On October 10, RP requested from EPA an extension for the submittal of the status report. The status report was faxed to EPA on October 11, and a hard copy was sent to the distribution list via regular mail on October 11.

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

Between October 10 and 13, Kohl Excavating filled in the round sump which had been used to store sediment from the sewer clean out, backfilled the excavation at Outfall 4, and fixed a break in the METRO force main. Kohl also asphalted the round sump, the area where the METRO force main was broken, and the railroad tracks at the old VBL loading area and also created a partial ramp over the on-ground power line located across the South Road.

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Kohl Excavating started preparation work for the remaining paving on October 23. This work included the installation of two catch basins along the North Road and one catch basin along the South Road. It also included cutting off two PIV valves and lowering them to grade. On October 27, Kohl grouted up the main line going to the process sump (which cross connected the storm system and the METRO sewer system) and the process line located between the Maintenance Building foundation and the tank farm (through the area where LNAPL has been observed).

The paving will be performed by Lakeridge Paving Co. in November. This paving work includes the area north of the North Road next to the old change house (Kohl Excavating installed two catch basins in this area), patch work in the old north tank farm near the lab, the graveled area of the South Road Excavation (Kohl Excavating installed one new catch basin in this area), the PCB ditch area, a piece near the southwest comer of the Distribution Center/Warehouse, and the area immediately south of the maintenance building slab.

Northwest Container Services placed an oil/water separator on the pre-cast concrete secondary containment pad in early October. This oil/water separator is connected to a sump which drains a large existing concrete pad. Northwest Container is using this area for washing out empty containers.

Storm Water Discharges.

Most of the storm water collected on site has been placed in the 800,000 gallon AST on site. However, in early October, the tank became so full (200,000 gal.) that the head of water in the tank prevented the pump from keeping up with the volume of storm water generated. As a result, during one storm event, some of the water was temporarily stored in the rectangular sump located within the containment area where the process sump and the API separator are also located.

On October 13, RP explained to METRO that additional storm sewer line cleaning was necessary before the outfall could be re-opened, and this had delayed discharging storm water to the Duwamish Waterway. RP requested that METRO accept the 200,000 gallons of accumulated storm water. METRO agreed to a 10,000 gpd discharge; but, in a later conversation, suggested that the discharge be increased to 25,000 gpd to expedite emptying the tank. Analytical results indicated that the water met METRO's discharge limits, and, on October 24, RP began discharging accumulated storm water to the METRO sewer.

Outfall 7 Storm Water Line Rinsate Sampling.

On October 19, Ventilation Power pumped out the storm line oil/water separator, the manhole in which the storm water sampling equipment was installed, and the storm lines. Sediment that had accumulated in the oil/water separator and the last few storm sewer manholes since the last sewer cleaning was also removed.

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During early morning (3 to 7 AM) on October 20, CH2M HILL sampled a storm event. Analytical data for this rainfall event were received on October 24; these data indicated that metals, pH, oil and grease, pesticides, PCBs, semivolatile organics, and BTEX concentrations were all below the Maximum Daily Limits (MDL) calculated from Ecology's Water Quality Criteria. The analytical results and methods for calculating the MDLs were discussed with Pam Elardo of Ecology on October 26. Ecology approved the discharge of storm water from Outfall 7 to the Duwamish Waterway. On October 27, the valve on the storm water line to the Duwamish was opened. Storm water collected during the sampling event in the Rain for Rent tank was drained through the discharge line to the Waterway on October 27.

NPDES Permit Cancellation.

On October 13, RP sent a letter to Ecology requesting cancellation of the site's wastewater discharge permit. This permit covered discharge of non-contact cooling water to the Duwamish Waterway. A letter from Ecology officially canceling the permit was received on October 24.

Task A3. Interim Measures

PCB-Contaminated Compressor Pad.

Six drums containing used fabric filters, water containing suspended solids, recovered sediment from rented storage tanks, and used activated carbon were shipped from the site by AETS on October 30 (see below, *Miscellaneous Field Support*). The drums will be incinerated at APTUS.

LNAPL.

RP monitored the wells for LNAPL on October 30 and 31. Three wells were not accessible at this time since containers belonging to Northwest Container Services were being stored on top of them; these wells were B2, DM-5, and G1.

The amount of LNAPL was similar to that detected in September. RP detected 0.03 inches of LNAPL in MW-12 on October 30. Globules were visible in the sample from MW-12. The sample from well H11 had a film,. while samples from wells DM-2A and 2B had very slight sheens. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

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Task A8-Round 3 Technical Memorandum

While reviewing the data for the Round 3 Technical Memorandum, it became apparent that certain data were suspect. Specifically, these data were the outfall sewer sediment grain size analyses (the percent passing each sieve did not add up) and the TDS results for the seeps analyses (when balanced with amount of ions and TOC reported, the numbers were physically impossible). CH2M HILL called the labs and asked them to look into these problems.

On October 9, S-Cubed faxed CH2M HILL revised Form 1s for the grain size analyses for SDGs 5227 and 5227.1. On October 12, PACE MidPacific sent CH2M HILL a letter with the revised TDS results for SDG V4063; half of the TDS results were 1/2 to 1/4 of the original reported value. PACE verified additional data; this information was received on October 25.

Task S1-Miscellaneous Field Support

Sampling for disposal of waste piles and drums from various operations was conducted by AETS/Chemical Waste Management Inc. on September 29 and October 2. The waste piles consisted of:

1) Mixed vegetation and soil from grading the Background Area so Northwest Container could use the area,

2) Clay from repairing sinking sections of the South Road,

3) Soil from preparing for paving near the former VBL rail loading facility, and

4) Soil and well construction debris generated during rehabilitation of monitoring wells.

The drummed waste consisted of:

1) Sludge containing PCBs from "Outfall 2" sewer line clean out,

2) PCB-contaminated personal protective equipment,

3) PCB-containing solids and liquid from the compressor pad and "Outfall 2" remediation projects,

4) Drill cuttings and associated material from the RFI,

5) Soil from telephone pole installation and post indicator valve (PIV) removal,

6)Waste Maintenance Department materials to be packed in drums as lab packs, and

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7) Acid waste from demolition of pump pedestal.

Drum Disposal.

AETS completed waste profiles for the drums stored in the warehouse and shipped the first load to Chemical Waste Management's (CWM's) Arlington, OR facility on October 28. Sixty-eight drums were shipped off site. However, this shipment was overweight; consequently, seven drums were removed from the truck and stored at Tri-State Trucking's facility in Maytown, WA. Sixty-one drums of soil cuttings continued on the truck and were transported to Chemical Waste Management's landfill at Arlington, OR.

On October 30, a second shipment of 12 drums was shipped off site with instructions to pick up the seven drums held at Tri-State Trucking. This resulted in 19 drums transported to CWM's Arlington landfill. In addition to these 19 drums, six drums of PCB contaminated materials were transported to Arlington where they joined another shipment and were sent to CWM's Henderson, CO facility. The drums are being held at the Henderson facility pending incineration at Rollin's APTUS facility located in Aragonite, UT.

Soil Pile Removal.

AETS removed approximately 100 cubic yards of Class D soil (grubbing material from grading the Background Area) stored near the southwest corner of the Distribution Center/Warehouse on October 28. This soil was disposed of at Waste Management's Columbia Ridge facility in Arlington, OR.

Approximately 60 tons of non-hazardous soils from the well rehabilitation, clay sink hole, and railroad tracks, was shipped to CWM's Arlington hazardous waste landfill on October 28. RP decided to ship these soils to a hazardous waste landfill because the soils were from the interior portion of the site. The remaining soil piles are scheduled for disposal on November 4-5.

Sewer Line Videotaping.

On October 12 Gelco videotaped the sewer lines that had previously contained PCB contaminated sediment. Sediment had re-deposited in the 8" line that went north from the ditch; Ventilation Power re-cleaned this line before the video camera(s) could go through the line,

Sump Cleaning.

On October 13, AETS pressure washed the rectangular sump located within the containment area near the process sump and the API separator. Approximately 1100 gallons of storm

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water were transferred from the rectangular sump to a Rain for Rent tank (239617) by Ventilation Power's vactor track, Approximately 25 gallons of sludge was recovered from the vactor truck, mixed with cement, and deposited in the partially full roll-off box.

On October 17, AETS pressure washed the round process sump. Prior to pressure washing, approximately 1400 gallons of storm water and sediment were removed by the vactor truck. This water was transferred to a Rain for Rent tank (239617) and an estimated 1 cubic yard of sediment and sludge deposited in the roll-off box. Approximately 1 foot of hard cake remained in the tank after cleaning. During the transfer to the Rain for Rein tank, a spill occurred that caused approximately 1 to 2 gallons of sediment sludge to drain to the storm sewer catch basin. The area of the spill was immediately cleaned by AETS. On October 19, AETS cleaned and pressure washed the catch basin and adjacent manhole.

One full roll-off box containing approximately 10 tons of stabilized sewer clean out sludge was taken off site for disposal at the CWM Arlington landfill on October 2; a partially full roll-off box containing 9 tons of stabilized sewer sediment was sent to CWM Arlington on October 27.

API Separator Clean Out.

AETS sampled the oil phase and the water phase of the API Separator on October 17 and the sludge phase on October 18.

The sludge was analyzed for TPH, total metals, and PCBs, and the oil layer was analyzed for PCBs only. The sludge contained 22 percent oil, high concentrations of metals, and 5.3 mg/kg PCBs. The oil contained 11 mg/kg PCBs.

PCB-Contaminated Sewer Wash Water.

A third rental tank (239026) was brought on site on October 9. This tank is being used to hold wash water that has been filtered through activated carbon. The water will be discharged to METRO if it passes the METRO limits.

On October 12, one of the carbon drums that RP was using to treat the PCB-contaminated line wash water developed a leak. The leaking water migrated to a nearby catch basin. RP stopped filtering the water and removed the drum. The catch basin and line were rinsed out during a storm event on October 15; the storm water went from this catch basin through a manhole to the process sump. AETS cleaned the process sump on October 17 and these lines on October 19, as discussed above.

Calgon supplied a replacement carbon drum; this drum was received at the site on October 27. RP started filtering PCB-contaminated water on October 28. The water is being treated using

fabric filters followed by two drums of activated carbon in series. Approximately 1000 gallons of water remain to be filtered.

Outfall 4 Wash Water in Aluminum Tank.

The wash water from cleaning Outfall 4 was analyzed for nine metals, cyanide, BTEX, and PCBs. Copper was the only parameter that exceeded METRO's discharge limits. RP will filter the wash water through a 5-micron filter on site and analyze the filtrate for copper. The filtrate will be discharged to METRO if the copper concentration meets the discharge limit of 8 mg/l, or less.

Deliverables Submitted

The September Progress Report was submitted to U.S. EPA on October 11, 1995.

On October 13, RP sent a letter to Carla Skog of Ecology requesting that the NPDES permit for the discharge of non-contact cooling water to the Duwamish Waterway be canceled.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

Lakeridge Paving Co. is scheduled to complete the miscellaneous paving described above in November, with the exception of the PCB ditch.

The remaining drummed soils and waste piles (e.g. clay pile from the South Road excavation, background area mulch) will be disposed of by AETS in November to either a solid or hazardous waste landfill.

Task A3-Interim Measures

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly. RP would like to limit the number of wells for LNAPL sampling, as discussed in the June meeting with EPA. The proposed wells and rationale for monitoring are as follows. The core set of six wells where we have seen LNAPL frequently in the past would continue to be monitored; H10, MW-12, H1, MW-15, MW-!8, and MW-19. We would also monitor seven perimeter/sentry wells where we would theoretically see LNAPL if it started to migrate: MW-14, MW-20, MW-17, H9, DM-7, G3, and B6.

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Task A8-Round 3 Data Technical Memorandum

As discussed in previous status reports, based on the problems associated with the data, the Round 3 Data Technical Memorandum will be submitted in January 1996.

Task S1-Miscellaneous Field Support

PCB-Contaminated Ditch.

Because of the detection of PCBs in the sewer sediments, the soils and pipe excavated from the ditch used to access and sample the 8" line may be contaminated with PCBs. This ditch will be sampled for PCBs in accordance with 40 CFR 761 and if necessary, soil will be excavated and removed. Terra Nova will perform sampling and oversight of the PCB ditch excavation. This work is scheduled to occur November 1 through 3.

Drum Disposal.

Drums remaining on site include lab packs (accumulation date 10/20/95), acids, soil cuttings, PPE, and a transformer. These drums will be held and sent off site with drums that will be generated in the near future (e.g. sediment generated during the cleaning of the Rain for Rent tanks).

Soil Pile Removal.

The remaining soil piles are scheduled for removal on November 4-5.

A sand pile (taken from a concrete sump filled with sand when the plant was demolished) will be transported to Washington Wrecking for recycling by December 1.

Asphalt generated during the monitoring well rehabilitation will be disposed of at Renton Recycling in November.

API Separator Clean Out.

The API Separator is scheduled to be cleaned in November.

Sewer Wash Water.

All wash water, both PCB-contaminated and non-PCB-contaminated, will be filtered and analyzed for discharge to METRO in November. If the contaminants are below limits, the water will be discharged to METRO.

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Storm Water.

Storm water in the 800,000 gal. tank on site will be discharged to METRO by November 10. Sediments in the bottom of the tank will then be cleaned out and disposed of appropriately.

rhône-p/MSR 10-95. EPA

RHONE POULENC - MARGINAL WAY FACILITY
MONTHLY LNAPL SURVEY LOG
Floating Product Layer Thickness in Feet

Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DM1A	DM1B	E3
6/7/94	0		0																																			
6/8/94	0		0																																			
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0											
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0											
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0			
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	Sheen	0	0	0	0.021	0			
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01	0	0	0		0			
12/5/94	0	0	0	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	Sheen	0	0	0	0	0			
1/11/95	0.26 [a]	Sheen	Sheen	0.04 [d]	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01 [a]	0	0	0	Sheen	0			
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0 [b]	0	0	0	0	NA	0	0	0	0	0	0	0	0	Sheen	Sheen	0			
3/23/95	0.01										0	0	0	0	0 [c]					0	0	0														0	0	Sheen [c]
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	Sheen	0	0	Sheen	Sheen	0			
3/28/95																								0														
4/27/95	0.063	0	Film [d]	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0	0.063 [c]	Sheen	0			
4/28/95					0		0	0	0							0														0	0							
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
6/30/95	Sheen [d]	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	Sheen	0	0			
7/28/95																	0			0		0	0	0				0	0						0			
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0		NA				0	0	0			0	0	0	0	0	0			
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	Sheen	0			
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	Sheen	0	0	0	0	0		0	0	0	0	0	Sheen	0			
10/4/95			Sheen [d]	[d]													0											0										
10/30/95	0.03	0	[d]	Film	0	0						0	0	0	0	0	0	NA	NA		0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0 [f]			
10/31/95							0	Sheen	Sheen	0	0							NA	NA	0						NA												

[a] Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when signficant LNAPL is present.
[b] No sheen noted when measurement device was placed in clean water, but water turned light brown after probing.
[c] Orange/rust colored residue on probe.
[d] Globules.
[e] Dark Phase.
[f] Odor of decay.
NA = Not accessible.